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Date: 18 July 2019

Government of Saskatchewan  
&  
City of Saskatoon

**To:** Geoff Meinert, Saskatoon Freeway Project Manager  
**Cc:** Hon. Lori Carr, Minister of Highways and Infrastructure  
Hon. Dustin Duncan, Minister of Environment  
Charlie Clark, Mayor of Saskatoon  
Randy Donauer, City Councillor (Transportation)  
Sarina Gersher, City Councillor (SEAC)

**Re: Saskatoon Freeway Project**

We write in respect of the Saskatoon Freeway Project, a 55km stretch of divided highway that in part is proposed to cut through the “*ecologically sensitive area*” (Saskatoon Freeway website) of the Swales in the north east quadrant of the City of Saskatoon.

The Canadian Parks and Wilderness Society - Saskatchewan Chapter (CPAWS-SK) raises concerns that in its current location this proposal has the potential to significantly impact critically important habitat. Native grasslands are among the most endangered ecosystems on the planet and here in Saskatchewan there has been a steady if not rapid decline of this increasingly rare habitat, seeing nearly 90 percent lost to the cumulative effects of development and the broader cultivation of land. With only fragments of this habitat remaining across the prairies of Saskatchewan it is imperative we do all we can and that is necessary to cease any further degradation, loss and fragmentation of this critical habitat. **We encourage the Government of Saskatchewan and the City of Saskatoon to ensure major highway operations, residential developments and other associated infrastructure in this location are subject to the most stringent of environmental assessments and ensures, where critical habitat and at-risk species are identified, avoidance measures (first solution) and robust/long-term mitigation plans (last solution) are a requirement for any subsequent approval/decision.**

**LACK OF ENVIRONMENTAL DATA**

With a lack of any detailed environmental assessment prior to determining the Freeway’s routing, CPAWS-SK is concerned decisions and endorsements are being made without the necessary information and without a complete and robust environmental assessment of the impact the Saskatoon Freeway could have on the ability of this ecosystem to naturally function and to its potential negative impact on important habitat and species, including Species at Risk. We are aware several minimal studies are being undertaken during this summer (2019). Yet we remain concerned the purpose, timing and detail of such studies will lead to inadequate data to determine the full extent of what is present across the area. This includes the potential limitations of the ecological assessment boundary and how this assessment would

best inform on the project's wider impact and any subsequent mitigation plans. **We therefore seek further clarification on the extent of these studies and any additional research that will be used to best determine and inform the location of the freeway and its likely impact.**

Work already undertaken by the Meewasin Valley Authority (MVA) has identified numerous key species, notably Species at Risk (SAR) and Species of Conservation Concern (SOCC), within the broader area, highlighting the vital role this critical ecosystem is providing to the many species that rely on these rich mosaics of wetland, riparian and grassland habitats. A recently published article looking at the ecosystem services of the northeast Swale considers previous MVA assessments of the ecosystem which identified *"the planning and future development of adjacent residential neighbourhoods is an enduring threat, that will shrink and further impact the Swale"*<sup>1</sup>. Considering these studies alone, including work undertaken by UoS PhD candidate Warrick Baijius<sup>2</sup>, who has identified current gaps in knowledge and outstanding concerns, a healthy and functioning ecosystem plays a pivotal role in providing positive benefits to society and biodiversity. It is concerning decisions have been and continue to be made on this ecosystem where *"there remains no serious discussion about the implications of climate change, biodiversity, or conservation in any of the studies to this point"* (Baijius, 2019).

The Saskatoon Freeway website states, as part of its environmental considerations, *"through the functional planning study, the Ministry of Highways & Infrastructure will work closely with stakeholders to reduce or eliminate potential impact to this ecologically sensitive area."* Without access to the project's business case or any study or engagement plan addressing the economies of alternative routing, we are left to hypothesis as to what these economies truly mean. We therefore must question the above quote that looks to *"eliminate"* potential impacts. When we talk about the elimination of potential impacts it is with the intention that any negative impacts to an ecosystem could and should be avoided. We therefore remain concerned that no alternatives are being considered or presented.

We are further concerned to hear that the City of Saskatoon and the RM of Corman Park have endorsed this project through the Swales before a comprehensive ecological assessment has been undertaken. We would certainly like to better understand the City of Saskatoon's position on this project, especially in relation to the relevant environmental policies and further processes to be considered.

While we welcome any intention to reduce and eliminate potential impacts to this ecological sensitive area, without a comprehensive ecological assessment and mitigation plan there remains a likelihood of harm to this critical habitat as a result of this project. **Therefore, the direct loss, degradation and fragmentation of wetland, riparian and grassland habitat remains of critical concern to CPAWS-SK.**

## CONCLUSION

Our urban environments are not immune to the effects of climate change. We place ourselves at even greater risk to the effects of climate change when we degrade, fragment and eliminate important natural spaces. Municipalities are clearly engaged in the need to develop a response in the form of policy and strategy to address their role, impact, and solutions to this very real and pressing issue. The Federal government has also underlined the pressures our urban and wilderness environments are experiencing by declaring a climate emergency, and Canada alone is already reporting higher than normal warming compared to other parts of the world.

We have separately acknowledged work under way on an 'offset scheme' by the province to address GHG emissions and have provided concise comments centred on the need for nature-based solutions.

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<sup>1</sup> A GIS-based model of ecosystem services for the Northeast Swale in Saskatoon, Saskatchewan - Spatial Knowledge and Information Canada, 2019, 7(1), 4, RONG SHEN, HONGHAO YU, ET AL - <http://ceur-ws.org/Vol-2323/SKI-Canada-2019-7-1-4.pdf>

<sup>2</sup> Comprehending Swale Ecosystems: Research Synthesis and Analysis, Warrick Baijius, 2019 - <https://artsandscience.usask.ca/news/articles/3737/> Nature needs space New USask report makes recommendations t

This would see the protection and better management of forests, wetlands and grasslands by governments as the ideal solution. Nature-based solutions offer a valuable and overdue strategy for combating climate change while protecting the province's unique biodiversity, for which the Swales represent a strong and robust example of this solution.

With the implications of a major development proposal through the Swales, it is essential that the long-term interests of grassland, wetland and riparian habitat and their associated species, including species at risk, are a priority consideration for the Government of Saskatchewan and municipalities in the decision-making process. Whilst economic development in our province is necessary, the unnecessary degradation, loss, disturbance and fragmentation of one of the most endangered ecosystems on the planet is not. We see this project as having the potential to negatively impacting critical native grassland habitat, important wetland and riparian habitat and their key species. We feel there must be a decisive voice when it comes to tackling climate change and biodiversity loss from all levels of government in Saskatchewan on this matter.

We see the prioritization and protection of this ecosystem as critical for its value to broader climate action, to society as an important cultural and natural space, and to the species that make it the ecologically and culturally important area it is and has been for thousands of years. We would suggest there is significant value (social, cultural, economic, environmental) to be harnessed from the long-term protection of this natural ecosystem for the benefit of all.

With only 11.8% of Canada's land and freshwater protected as of Spring 2019 – less than 10% in Saskatchewan – as part of the internationally agreed 17% protection target by 2020, it is abundantly clear – we can and should be protecting much more. *"...Its achievement will require the collective contribution of federal, provincial and territorial governments, Indigenous organizations, municipalities and local governments, non-profit organizations and the private sector"* (CCIUCN)<sup>3</sup> to adequately meet this target and to continue in the same vane towards the milestone CPAWS advocates to protecting 30% of land and freshwater by 2030<sup>4</sup>.

The greater conversation that should come from this is providing this important ecosystem the protection it deserves and ensuring we are leaders in environmental protection and the fight against climate change. Should you have any queries regarding these comments, please do not hesitate to contact us.

Yours sincerely,

**Stewart Coles**

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<sup>3</sup> IUCN Canadian Committee (CCIUCN), Pathway to Canada Target 1 - <https://cc-iucn.ca/category/pathway-to-canada-target-1/>

<sup>4</sup> Canadian Parks and Wilderness Society (CPAWS), July 17, 2019 - [https://cpaws.org/cpaws-calls-for-urgent-and-ambitious-action-to-tackle-canadas-nature-emergency/?fbclid=IwAR3qcoKvIS96nlmz-euemyjE3C4DeEe2emelKcpWyG\\_M5eg3K7Vb-Q9TjZo](https://cpaws.org/cpaws-calls-for-urgent-and-ambitious-action-to-tackle-canadas-nature-emergency/?fbclid=IwAR3qcoKvIS96nlmz-euemyjE3C4DeEe2emelKcpWyG_M5eg3K7Vb-Q9TjZo)